

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ISRAEL BOLLAG, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

VS.

XINHUA FINANCE MEDIA LTD., FREDY BUSH, SHELLY SINGHAL, J.P. MORGAN SECURITIES INC., UBS AG, CIBC WORLD MARKETS CORP., and WR HAMBRECHT & CO., LLC,

Defendants.

LEO YEN, Individually And On Behalf of All  
Others Similarly Situated,

Plaintiff,

VS.

XINHUA FINANCE MEDIA LTD., FREDY BUSH, SHELLY SINGHAL, ZHU SHAN, GRAHAM EARNSHAW, ALOYSIUS T. LAWN, JOHN H. SPRINGER, ZHOA LI, LONG QIU YUN, MORGAN SECURITIES, INC., UBS AG, CIBC WORLD MARKETS CORP., and WR HAMBRECHT & CO., LLC,

Defendants.

**Civil Action No.: 1:07-cv-03994-LTS**

**Civil Action No.: 1:07-cv-04046-LTS**

ALTON PARTNERS, Individually And On Behalf of  
All Others Similarly Situated,

Plaintiff,

**VS.**

XINHUA FINANCE MEDIA LTD., FREDY  
BUSH and SHELLY SINGHAL,

Defendants.

BRICKMAN INVESTMENTS INC., Individually And  
On Behalf of All Others Similarly Situated,

Plaintiff,

**VS.**

XINHUA FINANCE MEDIA LTD., FREDY BUSH, SHELLY SINGHAL, J.P. MORGAN SECURITIES INC., UBS AG, CIBC WORLD MARKETS CORP., and WR HAMBRECHT & CO., LLC,

Defendants.

**Civil Action No.: 1:07-cv-04443-LTS**

**Civil Action No.: 1:07-cv-04719-LTS**

**BLOOMFIELD INC., Individually And On Behalf of  
All Others Similarly Situated,**

Plaintiff,

VS.

XINHUA FINANCE MEDIA LTD., FREDY BUSH, SHELLY SINGHAL, J.P. MORGAN SECURITIES INC., UBS AG, CIBC WORLD MARKETS CORP., and WR HAMBRECHT & CO., LLC,

Defendants.

JIAJU CHU, Individually And On Behalf of All  
Others Similarly Situated,

Plaintiff,

VS.

XINHUA FINANCE MEDIA LTD., FREDY BUSH, SHELLY SINGHAL, J.P. MORGAN SECURITIES INC., UBS AG, CIBC WORLD MARKETS CORP., and WR HAMBRECHT & CO., LLC,

Defendants.

**NOTICE OF MOTION OF DELTA PARTNERS, LLC FOR  
CONSOLIDATION OF THE RELATED CASES, APPOINTMENT AS  
LEAD PLAINTIFF, AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

**PLEASE TAKE NOTICE** that Class member Delta Partners, LLC (the “Movant”)


hereby moves this Court pursuant to Fed. R. Civ. P. 42(c) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 (2007) and the Securities Act of 1933, 15 U.S.C.A. § 77z-1 (2007) at the United States District Court for the Southern District of New York located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order: (a) consolidating all related cases; (b) appointing Movant to serve as lead plaintiff; and (c) approving Movant's selection of counsel for the Class.

In support of its motion, Movant submits: (a) the Declaration of Maria J. Ciccio, Esq., dated July 23, 2007, and annexed exhibits; (b) a Memorandum of Law dated July 23, 2007; and (c) a Proposed Order granting Movant's motion for consolidation of the related cases, appointment as lead plaintiff and approval of its selection of lead counsel for the Class.

Dated: July 23, 2007


Respectfully submitted,

GAINEY & McKENNA

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Attorneys for Movant Delta Partners, LLC